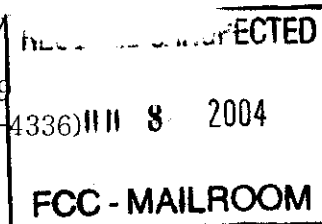


South Canaan Telephone Company
P O Box 160 Route 296
South Canaan, Pennsylvania 18459
Office (570/937-4114) Fax (570/937-4336)



June 18, 2004

Ms. Marlene H Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20544

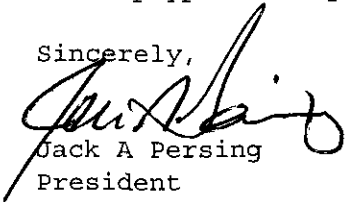
RE: In the Matter of the Pay Telephone Reclassification and
Compensation Provisions of the Telecommunications Act of
1996, CC Docket 96-128

Dear Ms. Dortch:

South Canaan Telephone Company (SCTC) submits this letter and accompanying certification as record that SCTC is not a "Completing Carrier" as that term is defined in the Commission's Order in CC Docket 96-128 released on October 3, 2003, respecting the obligations of the Completing Carriers to provide certain compensation and reporting to payphone service providers (PSPs), replacing the Commission's interim compensation rules effective July 1, 2004.

As SCTC is not a Completing Carrier nor does it handle the types of calls the Commission has specified as being subject to both compensation and reporting to PSPs, SCTC is not subject to such requirements at this time. If SCTC's operations are altered to the extent that SCTC necessarily becomes a Completing Carrier, SCTC intends to fully comply with the Commission's rules pertaining to this and all other payphone compensation and reporting matters.

Sincerely,



Jack A Persing

President

South Canaan Telephone

Cc: Ms Ruth Jaeger
APCC Services Inc.
625 Slater Lane Suite 104
Alexandria Virginia 22314

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**PAY TELEPHONE COMPLETING CARRIER CERTIFICATION
OF SOUTH CANAAN TELEPHONE**

1. My name is Jack A Persing. I currently serve as the President of South Canaan Telephone (SCT), a provider of local exchange telecommunications services as an Independent Local Exchange Carrier in the state of Pennsylvania. In this capacity, I have become familiar with the network operations of South Canaan Telephone and its practices associated with the completion of calls originated from Pay Telephones.
2. SCT is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.
3. SCT's provision of operator services for the completion of local calls from pay telephones is handled by Verizon Company through a contractual arrangement.
4. SCT has confirmed with Verizon that any calls processed by Verizon are included in the respective call tracking systems and compensation remittance process of Verizon.
5. SCT contracts with Verizon Company for completion of calls originated by access code.
6. SCT does not currently provide a subscriber toll-free service
7. In consideration of the aforementioned facts, SCT is not subject to the compensation or reporting requirements related to the Commission's Report and Order and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on *DATE* June 24, 2004

A handwritten signature in black ink, appearing to read 'Jack A Persing', is written over a horizontal line.


Jack A Persing, President

South Canaan Telephone
P O Box 160
South Canaan PA 18459

PAY TELEPHONE COMPLETING CARRIER CERTIFICATION
SOUTH CANAAN LONG DISTANCE

1. My name is Jack A Persing. I currently serve as the President of South Canaan Long Distance (SCLD), a provider of interstate telecommunications services as a toll reseller in the state of Pennsylvania. In this capacity, I have become familiar with the network operations of SCLD and its practices associated with the completion of calls originated from Pay Telephones.
2. SCLD is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.
3. With respect to coinless access code calls, SCLD is a switchless reseller.
4. With respect to subscriber toll-free payphone calls, SCLD is a switchless reseller. SCLD contracts with AT&T for completion subscriber toll-free calls.
5. SCLD does not perform call validation or processing functions for either access code calls or subscriber toll-free payphone calls.
6. SCLD does not create call detail records for either access code calls or subscriber toll-free payphone calls. SCLD action with respect to call detail records is limited to rating and billing.
7. SCLD compensates AT&T for the wholesale cost of the call.
8. SCLD has confirmed with AT&T that any calls purchased by SCLD are included in the respective call tracking systems and compensation remittance process of AT&T.
9. In consideration of the aforementioned facts, SCLD is not subject to the compensation or reporting requirements related to the Commission's Report and Order and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on *DATE*. June 24, 2004



Jack A Persing
President
South Canaan Telephone